DEALY SILBERSTEIN & BRAVERMAN, LLP Milo Silberstein (MS 4637) 225 Broadway, Suite 1405 New York, New York 10007 (212) 385-0066 Attorneys for Defendants Cinemacar II Inc., Cinemacar Leasing, Inc. and Guy Carnazza

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Plaintiff,

ALZAL CORP.,

-against-

CINEMACAR II INC., CINEMACAR LEASING, INC. : and GUY CRANAZZA,

Defendants.

Case No.: 12-cv-8228

NOTICE OF RENEWED MOTION FOR DISMISSAL OF THE COMPLAINT FOR LACK OF

PERSONAL JURISDICTION OR **IMPROPER VENUE** 

To: Robert Giusti, Esq. Robert Giusti, Esq. & Associates, PLLC 42-40 Bell Blvd. Suite 601 Bayside, New York 11361

PLEASE TAKE NOTICE that upon the annexed affidavits of:

- (a) Guy Carnazza;
- (b) Catherine Gooler;
- (c) Joseph Irizarry;
- (d) Edward Amato; and
- (e) Elina Turetskaya, the Memorandum of Law submitted herewith, and the Carnazza Reply Affidavit that was submitted in support of Defendants' initial motion to dismiss, Defendants Cinemacar II Inc., Cinemacar Leasing, Inc. and Guy Carnazaa (collectively "Defendants") will move this Court, pursuant to Federal Rule of Civil Procedure 12(b)(2) and (3), and Title 28 U.S.C.

§1927, for an order:

(a) dismissing the Complaint in this action, upon the ground that this Court lacks personal jurisdiction over Defendants or, in the alternative, for improper venue;

- (b) imposing sanctions on Plaintiffs' attorneys; and
- (c) granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that by agreement of the parties, approved by the Court, any opposing affidavit or memorandum of law must be served upon the undersigned attorneys for Defendants no later than August 23, 2013, and any reply affidavit or memorandum of law must be served upon Plaintiff's attorneys no later than September 17, 2013.

Dated: New York, New York July 26, 2013

DEALY SILBERSTEIN & BRAVERMAN, LLP

Milo Silberstein, Esq.

Attorneys for Defendants Cinemacar II Inc., Cinemacar Leasing, Inc. and Guy Carnazza

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